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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CHRISTIAN L. HOLMES-BROWN,

Plaintiff,

v.

TRUEVALUE SCREENING, LLC D/B/A
VERITABLE SCREENING,

Defendant.

Case No.: 2:25-cv-00130-CDS-EJY

**JOINT MOTION TO EXTEND ALL
REMAINING DEADLINES**

Pursuant to Local Rule 26-3, Plaintiff Christian L. Holmes-Brown (“Plaintiff”) and Defendant Truevalue Screening, LLC d/b/a Veritable Screening (“Defendant”), collectively referred to as “the Parties,” respectfully request that the Court enter an Order extending all remaining deadlines by a period of ninety (90) days. In support of the Motion, the Parties state as follows:

1. Plaintiff filed this Complaint on January 22, 2025 (Docket No. 1), and Defendant answered Plaintiff’s Complaint on February 12, 2025 (Docket No. 9).

2. On March 3, 2025, the Court entered the Scheduling Order (Docket No. 12), which

1 set the following deadlines:

- 2 a. Expert Disclosure: June 18, 2025
- 3 b. Rebuttal Expert Disclosure: July 18, 2025
- 4 c. Discovery Cut-Off: August 29, 2025
- 5 d. Dispositive Motions: October 10, 2025
- 6 e. Joint Pretrial Order: November 14, 2025

7 3. The Parties have diligently pursued discovery. Namely, the Parties have both
8 served Rule 26(a)(1) Initial Disclosure Statements. On March 3, 2025, Plaintiff served his initial
9 set of written discovery requests on Defendant. Defendant's initial set of discovery responses and
10 document production were due April 24, 2025, however, Plaintiff has yet to receive responses
11 from the Defendant. Plaintiff has also served a third-party subpoena and is working on obtaining
12 documents and deposition testimony.

13 4. Plaintiff anticipates noticing Defendant's deposition as soon as Defendant's initial
14 set of discovery responses and any additional documents have been received. Defendant's
15 responses and document production are necessary prior to Defendant's deposition as this is what
16 Plaintiff will use to determine the topics to discuss during Defendant's deposition.

17 5. Further, Plaintiff will need to take the 30(b)(6) deposition of Defendant prior to
18 determining whether an expert is needed. If an expert is needed, Plaintiff will then need to locate
19 an expert, retain an expert, and have an expert report prepared prior to the June 18, 2025, expert
20 disclosure deadline.

21 6. Accordingly, the Parties seek additional time in order to receive Defendant's initial
22 set of discovery responses and document production, determine the topics to be discussed at
23 Defendant's deposition, schedule Defendant's deposition, take the deposition itself, obtain a
24 transcript, and retain experts prior to the expert disclosure deadline.

25 7. Federal Rule of Civil Procedure 6(b) provides trial courts with the authority to
26 extend time periods. Good cause exists to extend the expert discovery deadlines as the Parties
27 have diligently prosecuted this case and additional time is required to take prepare for and
28

1 schedule Defendant's deposition, retain experts, and adequately prepare for the trial.

2 8. The additional time will allow the parties to conduct additional fact discovery,
3 including completing written discovery, taking depositions and resolving any discovery issues,
4 and determining whether expert discovery is needed in this matter.

5 9. This motion is not filed for any improper purpose and is not intended to delay.
6 Additionally, the Parties do not anticipate a need for any further extensions at this time. Further,
7 none of the Parties will be prejudiced by an extension of these deadlines. Rather, the extension
8 will conserve party/court resources and time, as well as promote judicial efficiency.

9 WHEREFORE, the Parties respectfully request that this Motion be granted, and the Court
10 issue an Order extending the remaining deadlines in this case by ninety (90) days as follows:

<u>EVENT</u>	<u>ORIGINAL DEADLINE</u>	<u>PROPOSED DEADLINE</u>
Expert Disclosures	June 18, 2025	September 16, 2025
Rebuttal Expert Disclosures	July 18, 2025	October 16, 2025
Discovery Cut-Off	August 29, 2025	November 27, 2025
Dispositive Motions	October 10, 2025	January 8, 2026
Joint Pretrial Order	November 14, 2025	February 12, 2026

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RESPECTFULLY SUBMITTED this 30th day of May 2025.

Consumer Justice Law Firm PLC

By: /s/ McKenzie Czabaj
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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Date: May 30, 2025